

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

In re: : Chapter 7
:
DEAN MAYNARD BOLAND, : Case No. 16-10250
:
Debtor. : Judge Jessica Price Smith

**JOINT MOTION SEEKING ENTRY OF AN AGREED ORDER FURTHER
EXTENDING, THROUGH JUNE 10, 2016, THE TIME FOR JOHN W. FORREST TO
FILE A COMPLAINT FOR NONDISCHARGEABILITY OF DEBT PURSUANT TO
SECTION 523 OF THE BANKRUPTCY CODE**

John W. Forrest (“Mr. Forrest”), a party in interest in these proceedings, and Dean Maynard Boland (“Debtor”), by and through the undersigned counsel, hereby move this Court for entry of an agreed order, extending, through June 10, 2016, time for Mr. Forrest to file a *Complaint for Nondischargeability of Debt* (a “Complaint”), pursuant to § 523(a) of the Bankruptcy Code. In support of this Motion, the parties respectfully represent as follows:

BACKGROUND

1. On January 22, 2016 (the “Petition Date”), the Debtor filed a voluntary petition for relief under chapter 7 of the Bankruptcy Code. Mr. Richard A. Baumgart, Esquire serves as the Chapter 7 Trustee (the “Trustee”) in the Debtor’s case.

2. The original deadline for the filing of a complaint to have a debt excepted from discharge pursuant to § 523(a) of the Bankruptcy Code was April 29, 2016 (the “Deadline”). On May 13, 2016, this Court entered its order extending the Deadline through and including May 31, 2016.

3. The parties have been engaged in substantive ongoing negotiations for the resolution of outstanding issues. However, completion of the process and related documents requires additional time.

4. The parties request that that the Deadline for Mr. Forrest to file a Complaint, be further extended, through and including June 10, 2016 (the "Extension"). The parties submit that the requested Extension will not prejudice the interest of the Debtor, his estate or other parties in interest, and promotes the goals of judicial economy and efficiency.

5. The Trustee has been contacted, and has no objection to the relief requested herein.

WHEREFORE, the parties respectfully request that this Court enter its Order (i) extending, through June 10, 2016, the time for Mr. Forrest to file his Complaint, and (ii) granting such other relief as is just.

SEEN AND AGREED:

/s/ Dov Y. Frankel
Dov Y. Frankel (#0077562)
dfrankel@taftlaw.com
Taft Stettinius & Hollister LLP
200 Public Square
Suite 3500
Cleveland, Ohio 44114
Telephone: (216) 241-2838
Facsimile: (216) 241-3707

ATTORNEYS FOR MOVANT, JOHN W. FORREST

/s/ Stephen D. Hobt
Stephen D. Hobt(#0007681)
1370 Ontario Street, #450
Cleveland, Ohio 44113
Telephone: (216) 771-4949
Facsimile: (216) 771-5353
shobt@aol.com

ATTORNEYS FOR DEBTOR, DEAN MAYNARD BOLAND

1713613_1

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing *Motion for Entry of an Agreed Order, Extending, Through June 10, 2016, the Time for Mr. Forrest to File a Complaint for Nondischargeability of Debt* was served this 27th day of May, 2016:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the court's Electronic Mail Notice List:

- Stephen D. Hobt, on behalf of the Debtor., at shobt@aol.com
- Richard A. Baumgart, Chapter 7 Trustee, at baumgart_trustee@dsb-law.com
- Sheldon Stein, on behalf of Victoria Bloom and Peter Lora, at ssteindocs@gmail.com
- United States Trustee (Registered address)@usdoj.gov

/s/ Dov Y. Frankel

1713613_1